

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO, EASTERN DIVISION - CLEVELAND

In re:) CASE NO. 20-11614
)
ROBERT FRANKLIN TRAVIS,) CHAPTER 13
JR.)
) JUDGE ARTHUR I. HARRIS
Debtor)
)
)

NOTICE OF MOTION
FOR RELIEF FROM STAY

FOX RUN ASSOCIATION, INC. has filed papers with the court to obtain relief from the automatic stay.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the Motion for Relief from Stay, then on or before **May 5, 2022**, you or your attorney must:

File with the court a written request for a hearing, or if the court requires a written response, an answer, explaining your position at:

Howard M. Metzenbaum U.S. Courthouse
201 Superior Avenue
Cleveland, OH 44114.

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also mail a copy to:

Darcy Mehling Good, Esq.
Shannon M. McCormick
Kaman & Cusimano, LLC

50 Public Square, Suite 2000
Cleveland, OH 44113
Attorneys for Movant

Lauren A. Helbling
200 Public Square Suite 3860
Cleveland, OH 44114-2321
Chapter 13 Trustee

To be served electronically via ECF

Andrew R. Vara, Esq.
Howard M. Metzenbaum U.S. Courthouse
201 Superior Avenue, East - Suite 441
Cleveland, OH 44114
U.S. Trustee

Please take further notice that a Hearing on the Motion will be held on May 12, 2022 at 1:00 pm, or as soon as thereafter as this matter may be heard before the Honorable Judge Arthur Harris.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an Order granting that relief.

Date: April 19, 2022

Respectfully submitted

KAMAN & CUSIMANO, LLC

/s/ Shannon M. McCormick
Darcy Mehling Good (0068249)
Shannon M. McCormick (0084855)
50 Public Square, Suite 2000
Cleveland, OH 44113
(216) 696-0650 / FAX (216) 771-8478
bankruptcy@kamancus.com

CERTIFICATE OF SERVICE

I certify that on April 19, 2022, a true and correct copy of Notice on Motion was served via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:-

William J. Balena, Esq., on behalf of Robert Franklin Travis, Jr., debtor

Lauren Helbling, Esq., Chapter 13 Trustee at lhelbling13@ecf.epiqsystems.com

Andrew R. Vara, Esq., U.S. Trustee, at ustregisteredmailbox@usdoj.gov and at ustpregion09.cl.ecf@usdoj.gov

Cynthia A. Jeffrey, on behalf of Creditor Ford Motor Credit Company at bankruptcy@weinerlaw.com

Patrick A. Hraby, on behalf of Creditor Freedom Mortgage Corporation at Patrick.hrupby@brokandscott.com

Richard John LaCivita, on behalf of Creditor Mortgage Research Center, LLC at bknotice@reimerlaw.com

And by regular U.S. mail, postage prepaid, to:

Robert Franklin Travis, Jr.

1130 Hunting Hollow

Grafton, OH 44044

Debtor

/s/ Shannon M. McCormick

Darcy Mehling Good (0068249)

Shannon M. McCormick (0084855)

50 Public Square, Suite 2000

Cleveland, OH 44113

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